

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**STIPULATION AND [PROPOSED]
ORDER REGARDING EXTENSION OF
DEADLINE FOR FACEBOOK, INC. TO
FILE STATEMENT IN SUPPORT OF
SEALING**

By and through their undersigned counsel, the parties hereby stipulate and agree as follows:

1. On March 11, 2022, Plaintiffs filed by email a Notice of Motion, Motion, and Memorandum in Support of Motion for Sanctions (Dkts. 877, 879), accompanied by a declaration and 68 exhibits in support (Dkt. 878). In total, Plaintiffs' submission numbers over 2,000 pages and includes information that Facebook has designated confidential or highly confidential under the Protective Order in this action. Dkt. 122.

2. As agreed by the parties, Plaintiffs filed their submission temporarily under seal accompanied by an Administrative Motion To Consider Whether Another Party's Material Should Be Sealed (Dkt. 873) pursuant to Civil Local Rule 79-5(f).

3. Pursuant to Civil Local Rule 79-5(f), the deadline for Facebook to file a statement and/or declaration in support of sealing is seven days after the filing of Plaintiffs' Administrative Motion To Consider Whether Another Party's Material Should Be Sealed (March 18, 2022).

4. Given the large volume of materials within Plaintiffs' submission that must be evaluated for confidentiality, Facebook has asked Plaintiffs whether they would agree that the deadline for Facebook to submit a statement and/or declaration in support of the confidentiality of materials attached to Plaintiffs' Administrative Motion To Consider Whether Another Party's Material Should Be Sealed shall be extended by two weeks. Plaintiffs have agreed to that extension, pending the Court's approval.

5. Facebook shall submit supplemental materials in support of sealing by April 1, 2022.

Dated: March 18, 2021

KELLER ROHRBACK LLP

By: /s/ Derek W. Loeser
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DATED: March 18, 2021

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Attorneys for Defendant Facebook, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: _____

VINCE CHHABRIA
United States District Judge

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained.

DATED: March 18, 2022

By: /s/ Russell H. Falconer
Russell H. Falconer

CERTIFICATE OF SERVICE

I, Russell H. Falconer, hereby certify that on March 18, 2022, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

By: /s/ Russell H. Falconer
Russell H. Falconer